

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

WEQ 22-028294
LOGS Legal Group LLP
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Kathleen M. Magoon - 040682010
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ATTORNEYS FOR WELLS FARGO BANK, N.A.

In Re:

LINCOLN WHITE AND DORIS WHITE,
DEBTORS

Case No.: 18-19773-CMG

Judge: HONORABLE CHRISTINE M
GRAVELLE

Chapter: 13

NOTICE OF RESPONSE TO MOTION TO SELL

The undersigned, LOGS Legal Group LLP, attorneys for the Secured Creditor, Wells Fargo Bank, N.A. the holder of a Mortgage on Debtors' property located at 729 Spruce Street, Trenton, New Jersey 08638, hereby objects to Debtors' Motion to Sell Real Property on limited grounds:

1) On February 3, 2022, counsel for the Debtor(s) filed the instant motion seeking an Order Authorizing Sale of Real Property commonly known as 729 Spruce Street, Trenton, NJ 08638. See ECF Doc.:73.

2) Secured Creditor is not opposed to the basic principle of the Debtor(s) selling the property; provided that any Order entered by the Court clearly specifies that such sale is contingent upon Wells Fargo Bank, N.A.'s lien being fully satisfied through this transaction, and payoff funds being received by Secured Creditor within ninety (90) days from entry of Order.

3) In the event an Order granting Debtors' motion is entered, Secured Creditor will provide an updated and accurate payoff statement to coincide with a scheduled closing date upon advance notice and request from the Debtor(s).

4) Secured Creditor further requests that any Order entered by the Court clearly specifies that any sale short of a full payoff will be subject to Wells Fargo Bank, N.A.'s final approval.

WHEREFORE, Wells Fargo Bank, N.A. respectfully requests that the Debtors' Motion to Sell Real Property be denied; or in the alternative, requests the provisions presented in this Objection be incorporated in the Order resulting from the Debtors' Motion to Sell.

LOGS LEGAL GROUP LLP

Dated: 2-23-2022

By: /s/Elizabeth L. Wassall
Elizabeth L. Wassall, Esq.



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CERTIFICATION OF SERVICE

I, Ryan Cartrette the undersigned

1. ☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Kathleen M. Magoon, Esquire and Elizabeth L. Wassall, Esquire, who represents the Secured Creditor in the above-captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On _____, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

Limited Objection to Motion to Sell.

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Signature

Dated: 2/23/2022

/s/ Ryan Cartrette

Printed Name

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Kevin C. Fayette Law Offices of Kevin Fayette, LLC 1675 Whitehorse Mercerville Road Suite 204 Hamilton, NJ 08619		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Lincoln White and Doris White 116 Honeysuckle Drive Trenton, NJ 08638		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.